



Randy R. Bruegman  
Fire Chief

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October 16, 2006

Mr. Mike Nearman, Architectural Associate  
State Building Standards Commission  
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Sacramento, CA 95833  
FAX 916-263-0959

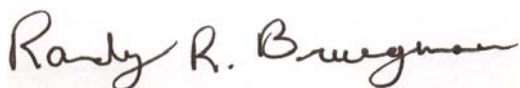
Dear Mr. Nearman:

Subject: 2006 Annual Code Adoption, Proposed Amendments to IBC and IFC Section 903.2.7

Proposed amendments to the 2006 International Building Code and 2006 International Fire Code will delete the requirement for fire sprinklers in R-3 occupancies. Both the International Code Committee and the National Fire Protection Association, by national consensus of their members, have included fire sprinklers for all residential occupancies in their model building and fire codes. There is no longer any justifiable reason to not install these time-proven and cost-effective life and property protection systems in all residential occupancies. Every year this requirement is delayed increases the number of people exposed to the devastating effects of fire over the lifetime of a dwelling. The rationale of not providing this protection because the International Housing Code has not included the requirement is a very weak reason. Over 100 local jurisdictions in California have amended their Building and Fire Codes to include R-3 residential fire sprinklers. These life-saving systems need to be available with the next code adoption for all residents of California without each local agency having to go through the laborious process of local amendments. This is a common sense requirement that will provide a level playing field to all developers of single-family homes in the state.

Be advised also that the proposed amendment exception number one provides a potential loop hole for elimination of the current requirement for fire sprinklers in ambulatory residential care facilities for the elderly with more than six clients (new R-4 occupancy). It is hoped this exception is deleted entirely; however, if it prevails, the initial wording needs to be modified to: "Detached one- and two-family dwellings classified as R-3 and R3.1 occupancies..." The reason for this is that the new R-4 occupancy classification is only required to meet R-3 construction requirements and this will eliminate any misunderstanding in the intent of the Code.

Sincerely,

  
Randy R. Bruegman, Fire Chief

c: State Fire Marshal's Office